

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SERGIO L. RAMIREZ, on behalf of
himself and all others similarly situated,

Case No. 12 cv-00632-JSC

Class Action

Plaintiff,

V.

TRANS UNION LLC

Defendant.

**DECLARATION OF JOHN SOUMILAS, ESQUIRE
IN SUPPORT OF PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE TESTIMONY AND DOCUMENTS UNDER SEAL**

I, John Soumilas, declare as follows:

1. I am an attorney duly licensed to practice in the Commonwealth of Pennsylvania and the State of New Jersey.

2. I am one of the counsel of record for Plaintiff Sergio L. Ramirez in this matter after being admitted to practice *pro hac vice* by this Court on February 14, 2012 (Dkt. No 5), and have personal knowledge of the facts and circumstances of this matter.

3. Pursuant to L.R. 79-5(e)(1), Plaintiff seeks to file the following information in connection with Plaintiff's Motion to Certify a Class under seal:

a. Material which has been designated as confidential by Defendant Trans Union LLC under the protective order entered in this matter (Dkt. No. 37-1);

- i. Portions of Exhibit 1 to the Declaration of John Soumilas, Esquire in Support of Plaintiff's Motion to Certify Class, select portions of transcript of the deposition of Michael O'Connell. Defendant has marked the following full pages as confidential under the protective order: 36, 43-46, 52-56, 58-63, 66-67, 122, 133-35, 160-63, 166-68, 281.

ii. Portions of Exhibit 2 to the Declaration of John Soumilas, Esquire in Support of Plaintiff's Motion to Certify Class, select portions of the transcript of the deposition of Robert Lytle. Defendant has marked the following full pages as confidential under the protective order: 68-70, 72-73, 83-86, 98-99, 112-13, 139-41, 146, 203-05, 220-21, 223-25, 243-45, 247, 299-300 as

- iii. The entirety of Exhibit 5 to the Declaration of John Soumilas, Esquire in Support of Plaintiff's Motion to Certify Class, consisting of a document entitled "OFAC Hit Analysis," marked TU0009481 through TU0009487, produced in discovery in this matter.
 - iv. Portions of Exhibit 11 to the Declaration of John Soumilas, Esquire in Support of Plaintiff's Motion to Certify Class, Supplemental Responses of Trans Union, LLC to Plaintiff's First Set of Interrogatories. Defendant has marked all pages of the document as confidential under the protective order except for Supplemental Responses to Interrogatories 1, 2, and 3, for which Trans Union has agreed to withdraw its confidentiality designations.
 - v. Portions of Exhibit 16 to the Declaration of John Soumilas, Esquire in Support of Plaintiff's Motion to Certify Class, Response of Trans Union LLC to Plaintiff's First Set of Interrogatories. Defendant has marked all pages of the document as confidential under the protective order except for Response to Interrogatory 14, for which Trans Union has agreed to withdraw its confidentiality designation.

(material which has been designated as confidential by both third party Accuity, Inc. and Defendant Trans Union, LLC under the protective order entered in this matter Dkt. No. 37-1):

 - i. Portions of Exhibit 4 to the Declaration of John Soumilas, Esquire in Support of Plaintiff's Motion to Certify Class, select portions of the transcript of the deposition of Brent Newman. Accuity, Inc. has designated the following pages and line numbers as confidential under the protective order: 14:20-15:2, 15:6-9, 15:10-18, 50-52, 58, 60-62, 81-89, 100:1-106:17, 107:6-110:24. Defendant has also marked the following full pages as confidential under the protective order: 14-15, 50-52, 58, 60-62, 81-89, 100-106, 108-110.

1 I certify that the foregoing statements made by me are true. I am aware that if any of the
2 foregoing statements made by me are willfully false, I am subject to punishment.

3 Dated: March 14, 2014.

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5 John Soumilas
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